



3. During the review of Code Section 911, please note the wording used in the paragraph on the limitations on the amount of the deduction. The (b)(3)(C)(i) limitation is for an individual who qualifies as a taxpayer resident for such purposes under Section 911 (a) (1); that is, is an individual "who is a resident alien or a citizen or resident of the United States (or a citizen or resident of the United States or any agency thereof)." The (b)(3)(C)(ii) limitation is for individuals who are only and does not include nonresident alien individuals who are treated as such (interest, dividends, etc.).

4. Since this involves a 1974 tax return, it is suggested that the change be made as soon as possible because, as you note in paragraph one of reference 3, interest is accruing.

5. If we can be of any further assistance, please advise.

*v-de*  
VICTOR D. ULLERY

Distribution:  
Orig. & 1 - GOS (v/ste)  
1 - W/Pers